



ANNOTATED SFM EVALUATION GUIDE FOR THE HMMP/HMIS PROGRAM ELEMENT

I. Interview Questions

1. Have you **consolidated the fire code** HMMP/HMIS plan into your written implementation plan (i.e., CUPA Application, Policies, Procedures, instruction packet, etc.)? – [HSC 25404(c)(6), T27 15150(e)(6)(B), 15180(a), 15170(j) & (k), etc.] Note: Evaluator will compare written plans with actual implementation. Is CUPA doing what they say they would? Issues below should be addressed when consolidating.
2. Are local hazardous materials **ordinances consistent** with CUPA and State requirements, policies, and procedures? – [HSC 25404.2(a)(1)(E)(2)]. Note: Evaluator will review any haz mat ordinances for consistency, duplication, redundancies, etc. (e.g., Ordinance may conflict with CUPA policies on collecting FCHC or lesser inventory quantities. Have fire code haz mat sections been adopted? Which parts?)
3. Does the CUPA regulate **“all”** hazardous materials in **“any amounts”** as may be required in the fire code? If not, do the fire departments collect this data? Are entire duplicative plans being collected, or just inventories for smaller quantities? How are smaller quantities handled? Could these efforts be consolidated? [HSC 13143.9 (b) & (c), “Addendum”] Note: Is duplication occurring in the jurisdiction due to similar efforts by CUPA and fire agencies (e.g., FD collecting HMMPs and CUPA collecting HMBP)? [CFC applies to all hazardous materials. Table 105 Permit Amounts: “any amounts” for toxic gases, pyrophorics, unstable/reactive materials, highly toxic liquids, certain classes of oxidizers and organic peroxides – these require a permit, and thus an HMMP/HMIS, if determined necessary by the Chief. CFC/CBC have lesser “exempt” amounts, above which, inventory data may be needed (Tables 8001.15, 3-D, 3-E, & 3-I, 7902.5, 7903.2, 7903.3).
4. Do you collect any **additional information** with facility chemical inventory pursuant to the fire code on OES Form 2731, lines 210 and 246, or by an Addendum or attachment thereto? Have you discussed fire

agency requirements with the Fire Chief or their representative? [HSC 13143.9 (b) & (c), T19 2729.7(a)(1)]. Note: Examples: FCHCs, lower quantities, additional chemicals, more detailed site plans, pre-fire plans, etc., may be needed. Triggers: CFC permit amounts, CFC/CBC exempt amounts, ordinances, Chief's discretion, etc.

5. Are the fire agencies satisfied with the way you are **forwarding** and **sharing** HMBP information? Describe procedure. [HSC 13143.9 (b) & (c), HSC 25509.2(a)(3)]. Note: Compare with Fire Agency reports.
6. Have you assured that **warning signs** compliant with **UFC Standard 79-3** (NFPA Placards) are posted and maintained at exempted unstaffed remote facilities? [25503.5(c)(6)(C)]. Note: Coordinated with Fire?
7. Are you **forwarding information** on exempt unstaffed remote facilities to the appropriate fire jurisdiction? [25503.5(c)(6)(F)]. Note: Coordinated with Fire?
8. Have you conducted **meetings** with any of the fire agencies to discuss needs and maintain communication, coordination, consolidation, and consistency issues? Note: Examples: Quarterly Fire Chief's meetings, Fire Prevention Officer's, Task Force Groups, etc.
9. Is **inspection and enforcement coordinated** with Fire to eliminate duplication? Are you aware if local fire agencies may be conducting duplicative hazardous materials **inspection and enforcement** activities with respect to the HMBP and inventory collection? ? Have their been any complaints from the regulated community that fire and health are asking for duplicative information? Note: Could inspections or enforcement actions be coordinated, consolidated, and make consistent [HSC 25509.2(a)(4)]

II. Files and Document Review

1. Review 5 HMBP **files**
2. Review HMBP **packets and instructions**
3. Review **CUPA application**
4. Review any local hazardous materials **ordinances**.
5. Review **forwarding procedures**
6. Review **database** tracking
7. Obtain fire agency contacts

III. Conduct Fire Agency Visits